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**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

CLINTON BROWN,  
Plaintiff,  
vs.  
CLARK R. TAYLOR, AICP, THE  
LOS ANGELES COUNTY  
DEPARTMENT OF REGIONAL  
PLANNING,  
Defendant.

CASE NO. 2:22-cv-09203-MEMF-KS  
**Notice of Supplemental Authority**  
**Judge:** Honorable Maame Ewusi-  
Mensah Frimpong  
**Magistrate Judge:** Karen L.  
Stevenson  
**Action Filed:** 12/17/2022  
**Action Due:** 01/13/2023

**NOTICE OF SUPPLEMENTAL AUTHORITY**

**NOTICE TO THE COURT**, the Supreme Court issued an opinion on May 25, 2023, that directly impacts the current proceedings. (*Tyler v. Hennepin County, Minnesota, No. 22-166, slip op., (U.S. May 25, 2023)*). The supplemental notice of authority is applicable to the *de novo* review. (Dk. 55, 3, para 3). The Plaintiff has stated a claim under the Takings Clause and is entitled to Just Compensation. (*Id.*, 6, para 1).

The Supreme Court issued an opinion on May 25, 2023, that directly impacts the current proceedings. (*Sackett et ux. v. Environmental Protection Agency et al., No. 21-454, slip op., (U.S. May 25, 2023)*). The supplemental notice of authority is applicable to the *de novo* review. (Dk. 55, 5, para 1). The

government cannot occupy Plaintiff's property via regulation that is contrary to Congress and the Constitution. (*Sackett et ux. v. Environmental Protection Agency et al.*, No. 21-454, slip op., 13, para 2, (U.S. May 25, 2023).

**"I, Clinton Brown**, solemnly swear that I am submitting this filing with the Court, and that:

- (1) it is not being presented for any improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation;
- (2) the claims, defenses, and other legal contentions are warranted by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law or for establishing new law;
- (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and
- (4) the denials of factual contentions are warranted on the evidence or, if specifically so identified, are reasonably based on belief or a lack of information."

"I declare (or certify, verify, or state) under penalty of perjury under the laws of the United States of America that the foregoing is true and correct."



Clinton Brown

05/26/2023